

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Clare Thomas,
Plaintiff,

v.

City of Seattle,
Defendant.

No. _____

DECLARATION OF CLARE THOMAS

I, Clare Thomas, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.
2. I am a resident of Ballard, Washington, and am the president of the parent teacher organization at my child's school.
3. I have attended several protests in Seattle by myself and with my teenage daughter. In the past, for example, my teenaged daughter and I have attended women's marches, and May Day protests. I have never had to wear a gas mask at those protests.
4. But after attending the protest in Seattle on July 25, 2020, I would never allow my teenage daughter to come along with me. I went wearing goggles but will not return without purchasing a gas mask with a respirator.

- 1 5. While I was at the park in daytime with other protesters, a couple of flashbangs went off
- 2 within four feet of me. I was in the crowd of people on the street being rushed down
- 3 Broadway. SPD was throwing flashbangs into the fleeing crowd, at our backs.
- 4 6. I observed a nonchalance from Seattle Police Department with the explosives they used
- 5 for crowd control techniques.
- 6 7. After that experience I felt the need to order more advanced protective gear before
- 7 going back out to protest and I need to order a gas mask, respirator, knee pads and
- 8 before returning to protest.
- 9 8. Because I have not had the time to obtain these additional items – I have not
- 10 returned to a protest.

11 Executed this 3rd day of August 2020 at Bothell, WA.

12 I declare under penalty of perjury under the laws of the United States and the State of
13 Washington that the foregoing is true and correct.

14 /s/ Clare Thomas
15 Clare Thomas
16
17
18
19
20
21
22
23